

EXHIBIT 31

Phone Call with Artis and Betty LeHew

(Notes by Helen Ann Coin)

October 23, 2012 at 2:00pm

Betty called Artis from the Philly office to follow up on the previous day's conversation.

Artis said we didn't go over whole list the last time; can I address the other items?

Betty said she would listen and document her responses for Nancy and Chris but they may have follow-up questions.

After consideration, Artis said she needs to come clean and have a clear conscience.

She said Troi Bryant is her daughter Brittani's father.

She hired him based off of skill set.

They had the baby during high school.

Betty said it was against policy to hire Troi without letting anyone else know and get approval.

She continued to say that it's against policy to hire a direct report in which you have a relationship with.

Artis didn't respond.

Page 2 - #1 bullet point (circled by LeHew)

Artis brought up the concern regarding the special exam given in May 2011.

Artis said that Charisse made a mistake and failed to follow up.

Artis said emails can be found as proof and evidence.

Betty said she would have Nancy look into this.

Concern #2

Artis brought up the concern regarding staff food and clothing being discarded.

She said that's not true.

Employees were asked to bring cups with lids.

The Center provided coffee cups.

Houston used to provide blue mugs that said "CSEC Houston" as Christmas gifts, but stopped giving them out when Dennis sent a notice about budget cuts.

The next issue was the poor physical condition of Houston Center and the disorganization Artis said that Ray Rosenberg told her how organized and clean the center was when he came to visit. Atlanta staff (Sean) came and threw away old boxes when Chris asked them to clean up. Artis thought center was up to standards once Atlanta employees threw unnecessary boxes away.

Concern #4

Artis said the Center Staff will talk to Betty about these issues.

Concern #5

Artis was not clear on this one, Betty said she will find out specifics about this and get back to Artis.

Concern #6

Artis said Betty can talk to Heidi and refer to staff meeting notes.

Artis told Keith not to leave things in his office.

Artis said she had a meeting about supplies with Keith and Heidi.

Concern #7

Artis asked Betty to get more details about the origin of this concern.

Artis then stated that she will look into taking legal action

She said that she felt retaliated against.

She felt like this has been a constant witch-hunt because she came to Betty with her concerns over Chris Paul.

She said that she felt the retaliation started in March 2012.

She said Chris went to staff members about her taking a day off and instantly spread negativity around the center about Artis.

Artis went to Ann Jobe with her concerns about Chris.

Artis said that since then, Chris retaliated against her.

Artis thought her concerns weren't followed up on after her meeting with Ann Jobe.

She said Ann never came out to Houston in August like she said she was going to.

Artis gets a sense that it's an "abuse of power" and "bullying" and "intimidation."

Artis said the retaliation behaviors moved to Robert and Rupa.

If you say something, it will be held against you.

Chris talked about Keith's weight and size, making Artis uncomfortable.

Chris called Robert a "silver fox."

Artis told Chris she felt retaliated against.

She said that Chris thought things were getting better.

Artis wonders "where does the truth lie?"

Betty explained that she investigates every allegation and conducts many interviews the best that she can to determine the truth and that she will look into this complaint too.

Artis said that an email on August 23rd went out that included list of concerns.

She felt that the concerns in this email weren't investigated; it just happened.

In process of Artis getting sick, Chris continued to say things to staff to discredit Artis.

Staff reported this information to Artis.

After her meeting with Chris and Ann, Artis continued to cry out that it wasn't working out.

Artis spoke informally and off the record to Sharon, Joe and Kiandra about still having issues and that she felt retaliated against.

Artis said that Chris told her in March he was going to fire Artis and called her a "witch."

Chris embarrassed Artis in front of her family at the rodeo event.

He became obsessive and called her over 50 times.

Artis saved voicemails saying "Where you at?" and "If you took public transportation, you should be here."

Artis had to leave plans with family in order to assist him.

Artis spoke to other managers about Chris Paul: Peter (the most), Christy (a little), John (a little). Valerie (in passing).

She said that Chris told her that he paid her too much money based on the car she drives.

Chris called her a witch in front of staff.

Staff would say "that's my cue to leave."

Artis told all of these things to Ann Jobe.

Artis said that on March 8th, Chris said "I'm the boss."

And on March 7th, Chris called Artis a "wicked witch."

Betty said she will look into Artis' complaints about Chris and talk with the staff members in the Houston center about this.

Betty asked if she has spoken to anyone on the staff since this occurred. Artis said she hasn't heard from any staff since yesterday when she came in the center and she hasn't contacted anyone.

Betty will follow up with Artis tomorrow when center is closed